

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION

JULIA HUBBARD and KAYLA
GOEDINGHAUS,

Plaintiffs,

V.

TRAMMELL S. CROW, JR., DR. BENJAMIN
TODD ELLER, RICHARD HUBBARD, DR.
MELISSA MILLER, DR. JOSEPH BOLIN,
DR. SCOTT WOODS, DR.
MRUGESHKUMAR SHAH, MICHAEL
CAIN, COE JURACEK, PHILIP ECOB, H.J.
COLE, TEXAS RANGER CODY
MITCHELL,
KURT KNEWITZ, PAUL PENDERGRASS,
RALPH ROGERS, ROBERT PRUITT,
SCOTT
BRUNSON, CASE GROVER, RICHARD
BUTLER, MARC MOLINA, MICHAEL
HYNES, JR., SHAWN MAYER, JADE
MAYER, RCI HOSPITALITY HOLDINGS,
INC., INTEGRITY BASED MARKETING,
LLC, STORM FITNESS NUTRITION, LLC,
ULTRA COMBAT NUTRITION, LLC,
ECOLIFT HOMES LLC, ELEVATED
WELLNESS PARTNERS LLC, DOE
INDIVIDUALS 1–20, and DOE COMPANIES
21–30

Defendants.

Case No. 5:23-cv-00580-FB

Judge: Hon. Fred Biery

Courtroom: 8509

Date Action Filed: May 8, 2023
(transferred)

PLAINTIFFS' UNOPPOSED MOTION TO EXTEND TIME TO FILE A RESPONSE TO
DEFENDANTS' MOTIONS TO DISMISS

Plaintiffs Julia Hubbard and Kayla Goedinghaus (“Plaintiffs”) respectfully request an extension of time to file responses to the motions to dismiss and related filings by Defendants Crow (Dkt. No. 196), Miller (Dkt. No. 198), Woods (Dkt. Nos. 199, 199-001), Grover (Dkt. Nos. 200, 200-001), RCI (Dkt. Nos. 201, 201-001), Mitchell (Dkt. Nos. 202, 202-001), Juracek (Dkt.

No. 203), Eller (Dkt. Nos. 204–204-008), and Pruitt (Dkt. No. 205) (collectively, “Defendants”) making the new deadline August 17, 2023.

Pursuant to Local Rule CV-7(E)(2), a response to a dispositive motion shall be filed not later than 14 days after the filing of the motion. Given the numerous issues raised in Plaintiffs’ amended complaint and Defendants’ motions to dismiss, Plaintiffs seek additional time to further respond to Defendants’ arguments. Plaintiffs’ response briefs to the motions to dismiss are due on August 4, 2023. Because the issues addressed in Plaintiffs’ response briefs, will inform this Court’s consideration of Defendants’ motions to dismiss, Plaintiffs respectfully request a thirteen-day extension of time so they may file their response briefs for all Defendants simultaneously.

This request for an extension of time is not for the purpose of delay or to complicate the proceedings but in order to ensure that the issues in dispute are clearly presented to the Court. Plaintiffs have met and conferred with counsel for Defendants, and they are unopposed to the relief requested.

Dated: New York, New York
July 27, 2023

Respectfully submitted,

A handwritten signature in blue ink, appearing to read 'Matthew W. Schmidt', is written above a horizontal line.

Matthew W. Schmidt*

John G. Balestriere*

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**Admitted Pro Hac Vice*